

The Honorable Tana Lin

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMAZON.COM, INC., a Delaware
corporation; and WEBER-STEPHEN
PRODUCTS LLC, a Delaware Limited
Liability Company,

Plaintiffs,

v.

Individuals and entities doing business as the
following Amazon Selling Accounts:
ACKARY; AVANTAWAY; CCBAO; Grilllike;
HIMIRL; HOZOE; HZHJIY; MELLSSA;
MUSTBUILT; NEXPLAS; PSHIP; VIDVIE-
US; and DOES 1-10,

Defendants.

Case No. 2:21-cv-01512-TL

(LEAD CASE)

**DECLARATION OF SEAN
FARRELL IN SUPPORT OF
PLAINTIFFS' *EX PARTE*
MOTION FOR EXPEDITED
DISCOVERY**

AMAZON.COM, INC., a Delaware
corporation; AMAZON.COM SERVICES LLC,
a Delaware limited liability company; and
WEBER-STEPHEN PRODUCTS LLC, a
Delaware Limited Liability Company,

Plaintiffs,

v.

Individuals and entities doing business as
PDREAM and PHONIY; and DOES 1-10,

Defendants.

Case No. 2:22-cv-00674-TL

1 AMAZON.COM, INC., a Delaware
2 corporation; AMAZON.COM SERVICES LLC,
3 a Delaware limited liability company; and
4 WEBER-STEPHEN PRODUCTS LLC, a
5 Delaware Limited Liability Company,

6 Plaintiffs,

7 v.

8 Individuals and entities doing business as
9 MUSTUDY; and DOES 1-10,

10 Defendants.

Case No. 2:22-cv-00675-TL

11 AMAZON.COM, INC., a Delaware
12 corporation; AMAZON.COM SERVICES LLC,
13 a Delaware limited liability company; and
14 WEBER-STEPHEN PRODUCTS LLC, a
15 Delaware Limited Liability Company,

16 Plaintiffs,

17 v.

18 Individuals and entities doing business as STW
19 HARDWARE and ACOVER; and DOES 1-10,

20 Defendants.

Case No. 2:22-cv-00676-TL

21 I, Sean Farrell, declare and state as follows:

22 1. I am over the age of 18 and competent to testify to the matters stated herein.

23 I have been employed by Amazon.com, Inc. ("Amazon"), or its subsidiaries, since August
24 25, 2014. The statements below are made based on personal knowledge and my review of
25 the relevant business records and are true to the best of my knowledge and belief.

26 2. My current role is Senior Risk Manager for the Amazon Counterfeit Crimes
27 Unit where I am responsible for investigating bad actors suspected of selling counterfeit
products in the Amazon.com store (the "Amazon Store").

3. The Amazon Counterfeit Crimes Unit is a global team dedicated to pursuing bad
actors and holding them accountable to the fullest extent of the law, including working with
law enforcement and pursuing civil lawsuits.

1
2 4. Amazon offers third-party resellers and brand owners the ability to sell products
3 in the Amazon Store by registering an Amazon selling account.

4 5. I reviewed the selling account information for the three selling accounts
5 associated with Defendants in the newly consolidated actions: (1) PDream; (2) Mustudy; and
6 (3) STW Hardware (the "Selling Accounts").

7 6. The STW Hardware Selling Account provided a United States address to
8 Amazon that it represented was STW Hardware's business addresses.

9 7. The two remaining Defendant Selling Accounts provided only Chinese
10 addresses to Amazon.

11 8. Each Defendant Selling Account registered virtual bank accounts, administered
12 by the payment service provider Payoneer Inc., to transfer funds to and from their Selling
13 Accounts. Defendant Mustudy also used payment service provider, LL Pay U.S., LLC, to
14 receive proceeds from its counterfeit sales.

15 9. All of the Defendant Selling Accounts' counterfeit packages identified 2565
16 Sampson Avenue, Corona, CA 92879 as the return address. All of Defendants' Selling
17 Accounts identified 11751 Industry Avenue, Dock 41-46 Fontana, CA 92337, as either a
18 removal address¹ or as the origination address for the counterfeit packages.

19 10. Defendants' exact location and true identities remain unknown.

20 I declare under penalty of perjury that the foregoing is true and correct.

21 8/25/2022

22 EXECUTED this ____ day of August, 2022 at _____.

23 DocuSigned by:

24 Sean Farrell

25 Sean Farrell

26
27 ¹ A "removal address" is the physical address designated by the seller where products are sent that are returned by customers or removed from Amazon's fulfillment centers.